

Karen L. Willis, J.D.
220 West G Street, Suite E.
San Diego, CA. 92101
(619) 206-5311

January 21, 2020

VIA EMAIL

The Hon. Judge Cathy Seibel
300 Quarropas St., Courtroom 621
White Plains, NY 10601-4150

RESPONSE TO COURT'S MEMO ENDORSEMENT OF JANUARY 17, 2020

Dear Hon. Judge Seibel:

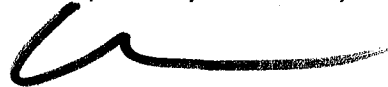
In response to the court's Memo Endorsement dated January 17, 2020, I inform the court that such attempt to agree on another date with the other parties wherein I could appear in person would likely prove futile considering that I am not in the position to travel to New Year prior to mid-April, or May 2020.

I think that would present an unreasonable delay when in fact I can appear telephonically as scheduled. I will commit however to talking as slowly and clearly as possible while on court call for the scheduled hearing.

If the court is inclined to consider a mid to late April or May hearing date, please let me know and I'll confer with the other parties now that they are on noticed as to the earliest I could be in New York.

Ms. Willis can attend by phone on 1/28/20 -- that proceeding will be mostly me giving some rulings and setting dates, so the parties will not be doing much talking -- but going forward it is not going to be acceptable to decline to come to New York for months on end. If she wants to participate in a litigation here, she is going to have to come to court from time to time even if it is not convenient.

Respectfully submitted,



Karen L. Willis

SO ORDERED.



CATHY SEIBEL, U.S.D.J.

1/22/20